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Attorneys for Defendants NAPHCARE, INC., NAPHCARE, U.S., INC., ALAN V. AGUILAR,
TIFFANY MENDONCA, ALICIA CLARKE and JEFFREY ALVAREZ, M.D.

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

WENDELL TRAYVON MARTIN, deceased, by
and through RAYMOND MARTIN, as Successor
in Interest; and RAYMOND MARTIN,
individually,

Plaintiffs,

vs.

COUNTY OF KINGS; DAVID ROBINSON,
Sheriff-Coroner-Public Administrator, Kings
County; KIM PEDREIRO, Jail Commander, Kings
County Sheriff's Department; Detention Sergeant
ROBERT VALDEZ; Detention Deputy MARYA
RAZO; Detention Deputy RODOLFO
BEJARANO; Detention Senior Deputy JOSHUA
COTA; Detention Sergeant HUMBERTO
HERNANDEZ; Detention Deputy BRIAN DAVIS;
Detention Senior Deputy CRAIG HOUSTON
(ID#5314); Detention Senior Deputy RUBEN
GONZALEZ; Detention Deputy BRIANNA
BROOKS; Detention Deputy EMMANUEL DIAZ;
Detention Deputy PATRICK FOWLER; Registered
Nurse ALAN V. AGUILAR; NAPHCARE, INC.;
NAPHCARE U.S., INC.; Licensed Vocational
Nurse TIFFANY MENDONCA; JEFFREY
ALVAREZ M.D.; Registered Nurse ALICIA
CLARKE; and DOES 1 through 60, inclusive,

Defendants.

CASE NO.: 1:20-cv-00288-DAD-BAM

**STIPULATION AND ORDER TO MODIFY
SCHEDULING ORDER (ECF NOS. 63, 72)**

The parties hereby stipulate and agree to modify the Scheduling Order (ECF Nos. 63, 72) in this matter as follows:

1. This is a case involving the death of WENDELL TRAYVON MARTIN while he was an inmate at Kings County Jail in Hanford, California. The parties have been diligently moving forward with discovery including extensive written discovery. Defendants have also completed the deposition of Plaintiff RAYMOND MARTIN. Following that deposition, Defendant NaphCare requested and subpoenaed additional records and documents, some of which still have not been received. Given the sheer volume of documents involved in this matter, the depositions of the individual Defendants have yet to be taken. Moreover, Plaintiff and Defendant NaphCare had a dispute regarding document production from NaphCare that took several months to resolve. The parties anticipate that the depositions of the Defendants, specifically the NaphCare Defendants, will be completed within the next 60 days.

2. Moreover, initial discovery in this matter was delayed due to illness by Plaintiff's counsel which required emergency surgery and, in recent months, COVID-19 related issues for NaphCare's counsel and his staff as well as additionally caused a significant and unexpected delay in discovery.

4. Therefore, despite diligent efforts, and given the number of defendants in this case, the parties will not be able to complete the non-expert discovery by the current deadline. Therefore, the parties agree to continue the discovery dates as follows:

<u>Event</u>	<u>Current Date</u>	<u>New Date</u>
Amendment of Pleadings	Closed	Closed
Expert Disclosure	November 1, 2022	January 9, 2023
Supplemental Expert Disclosure	December 1, 2022	February 8, 2023
Non-expert Discovery Cutoff	September 20, 2022	November 30, 2022
Expert Discovery Cutoff	January 9, 2023	March 17, 2023

Pretrial Motion Filing Deadline	March 3, 2023	May 12, 2023
Last Day to File Dispositive Motions	March 22, 2023	June 2, 2023

DATED: August 22, 2022

LAW OFFICE OF STEWART KATZ

/s/ Stewart Katz

By: _____

Stewart Katz, Esq.
Attorneys for Plaintiffs

DATED: August 22, 2022

THE SCHAPS LAW OFFICE, A.P.C.

/s/ Michael A. Schaps

By: _____

Michael A. Schaps, Esq.
Attorneys for Plaintiffs

DATED: August 22, 2022

MEDICAL DEFENSE LAW GROUP

/s/ Paul A. Cardinale

By: _____

Paul A. Cardinale, Esq.
Attorney for Defendants NAPHCARE, INC.,
NAPHCARE, U.S., INC., ALAN V. AGUILAR,
TIFFANY MENDONCA, ALICIA CLARKE and
JEFFREY ALVAREZ, M.D.

ORDER

Based on the parties' stipulation, and for good cause appearing, the Scheduling Order is modified as follows:

Expert Disclosure:	January 9, 2023
Supplemental Expert Disclosure:	February 8, 2023
Non-expert Discovery Cutoff:	November 30, 2022
Expert Discovery Cutoff:	March 17, 2023
Dispositive Motion Filing Deadline:	June 2, 2023

1 In addition, to accommodate the Court's scheduling requirements, the Pretrial Conference
2 currently set for June 19, 2023, is HEREBY CONTINUED to **November 20, 2023, at 1:30 p.m. in**
3 **Courtroom 5 (DAD) before District Judge Dale A. Drozd.**

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5 IT IS SO ORDERED.

6 Dated: August 23, 2022

7 /s/ Barbara A. McAuliffe
8 UNITED STATES MAGISTRATE JUDGE
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